

## **EXHIBIT M**

**From:** Jeffrey Pagliuca <[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)>

**Date:** June 20, 2016 at 6:46:36 PM MDT

**To:** Meredith Schultz <[mschultz@BSFLLP.com](mailto:mschultz@BSFLLP.com)>, Laura Menninger <[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)>

**Cc:** Sigrid McCawley <[Smccawley@BSFLLP.com](mailto:Smccawley@BSFLLP.com)>, Sandra Perkins <[sperkins@BSFLLP.com](mailto:sperkins@BSFLLP.com)>,

"[brad@pathtojustice.com](mailto:brad@pathtojustice.com)" ([brad@pathtojustice.com](mailto:brad@pathtojustice.com))" <[brad@pathtojustice.com](mailto:brad@pathtojustice.com)>

**Subject: Re: 2016-06-17 Ltr to Menninger enc Giuffre005614-Giuffre006279**

It is unfortunate that you waited until the night before Detective Recarey's deposition to dump all of this discovery on me. I expect that you had this information for many years, indeed, Mr. Edwards is mentioned in the discovery. I am not in a position to be able to adequately review it before the deposition. I expect that means that we may need to keep the deposition open pending my review of the documents.

Also, it appears to be a continuing problem that you list documents in your 26(a) disclosures but do not produce them even though we make multiple requests for the documents. This behavior is prejudicial and impeding out ability to adequately prepare for depositions and trial. Again, please produce all of the documents listed in your 26(a) disclosures as required.

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**From:** "Meredith com" <[mschultz@BSFLLP.com](mailto:mschultz@BSFLLP.com)>

**Date:** Monday, June 20, 2016 at 6:57 PM

**To:** Laura Menninger <[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)>, Jeffrey Pagliuca <[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)>

**Cc:** Sigrid McCawley <[Smccawley@BSFLLP.com](mailto:Smccawley@BSFLLP.com)>, Sandra Perkins <[sperkins@BSFLLP.com](mailto:sperkins@BSFLLP.com)>,

"[brad@pathtojustice.com](mailto:brad@pathtojustice.com)" <[brad@pathtojustice.com](mailto:brad@pathtojustice.com)>

**Subject: 2016-06-17 Ltr to Menninger enc Giuffre005614-Giuffre006279**

Counsel,

Please see the attached.

Thanks,

Meredith

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